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ELECTRONICALLY FILED
DOC #:
DATE FILED: 3-17-08

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March 13, 2008

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WRITER'S DIRECT DIAL:

VIA HAND DELIVERY

The Honorable Leonard B. Sand
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Re: Wheeler v. City of New York
 Docket No. 1:07-cv-03999 (LBS)

Dear Judge Sand:

I write with the consent of defendants' counsel, Arthur Larkin, Esq., to request a 60 day extension of the discovery deadline in this case. Discovery is presently set to close on March 14, 2008. This is the first request for an extension of discovery by either party in this case. Due to the heavy litigation schedules of counsel for both parties, we have been unable to make any substantial progress on discovery, although the parties have had several discussions about potentially settling this matter and have made substantial progress toward that end.

In light of the above, the parties respectfully request that this Honorable Court issue an order extending discovery to and including May 14, 2008.

Yours, etc.,

Jonathan C. Moore
 Jonathan C. Moore

JM/moc

cc. Arthur Larkin, Esq. (via fax)

MEMO ENDORSED

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JD Sand
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MEMO ENDORSED